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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA (RICHMOND)

In re:
CIRCUIT CITY STORES, INC., ET AL.,
Case No. 08-35653
Debtors.
Jointly Administered

MOTION FOR ADMISSION PRO HAC VICE

Louis E. Dolan, Jr., an attorney and a member in good standing of the bars of the State of Virginia, the United States District Court for the Eastern District of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia hereby moves the Court to enter an order permitting Dennis J. Drebsky to practice *pro hac vice* before the United States Bankruptcy Court for the Eastern District of Virginia for the purpose of representing TomTom, Inc., in the above-captioned Chapter 11 case and any related adversary proceedings. In support of this motion, the movant respectfully represents as follows:

- 1. Dennis J. Drebsky is a partner at the law firm of Nixon Peabody LLP ("<u>Nixon Peabody</u>"). Nixon Peabody maintains an office at 437 Madison Avenue, New York, New York 10022, and its telephone number is (212) 940-3000.
- 2. Mr. Drebsky is admitted to practice before the Bars of the State of New York, the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of New York, and the United States Court of Appeals for the Second Circuit, as well as the First, Third, Fourth, Fifth, Seventh, Eighth, Ninth, Tenth and D.C. Circuits. Mr. Drebsky is a member in good standing and eligible to practice in every jurisdiction

in which he has been admitted to practice. There are no disciplinary proceedings pending against Mr. Drebsky in any jurisdiction and he has never been suspended or disbarred in any jurisdiction.

3. An affidavit in support of this motion to admit Mr. Drebsky *pro hac vice* is attached herewith and incorporated herein by reference as Exhibits "A."

WHEREFORE, Louis E. Dolan, Jr. respectfully requests that the Court (i) enter an order permitting Dennis J. Drebsky to appear *pro hac vice* in and in connection with this Chapter 11 case, and (ii) grant such other relief as is deemed appropriate and just.

Dated: New York, New York January 14, 2009

Respectfully Submitted,

NIXON PEABODY LLP

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and

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